

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

Pursuant to Section 2 of the Foreign Agents
Registration Act of 1938, as Amended

For Six Month Period Ending

JAN 29 1978
(Insert date)

Name of Registrant

DEVELOPMENT COUNSELLORS INTL. LTD.

Registration No. 1421

Business Address of Registrant

733 Third Avenue - Suite 2100
New York, N. Y. 10017

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address

Yes ☐

No ☐

(2) Citizenship

Yes ☐

No ☐

(3) Occupation

Yes ☐

No ☐

(b) If an organization:

(1) Name

Yes ☐

No ☐

(2) Ownership or control

Yes ☐

No ☒

(3) Branch offices

Yes ☐

No ☒

2. Explain fully all changes, if any, indicated in Item 1.

NOT APPLICABLE

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection
Ended

NOT APPLICABLE

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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NOT APPLICABLE

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☒ **NOT APPLICABLE**

If yes, identify each such person and describe his services.

NOT APPLICABLE

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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NOT APPLICABLE

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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NOT APPLICABLE

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

Name of foreign principal

Acapulco Cultural & Convention Center

Date of Termination

6/77

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

Name and address of foreign principal

Date acquired

Chamber of Foreign Trade - German Democratic Republic

108 Berlin, Schadowstrasse 1B

1/78

Industrial Enterprises Inc. - West Royalty Industrial Park

Prince Edward Is., Canada C1E 1B0

9/77

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Netherlands Antilles Economic Mission

Newfoundland Dept. of Industrial Development

Trinidad and Tobago Industrial Development Corp.

St. Lucia National Development Corp.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

NETHERLANDS ANTILLES: Publicized and informed U.S. businessmen about economic opportunities in the Netherlands Antilles.

NEWFOUNDLAND: Publicized Newfoundland's investment climate in the United States via press releases, television appearances by provincial officials.

Trinidad and TOBAGO: Assisted and participated in industrial and trade shows; arranged for speeches and presentations by client to potential investors; worked with U.S. companies operating in Trinidad and Tobago to promote their operations to potential customers and suppliers in the U.S.

ST. LUCIA: Investment promotion counselling in direct mail, advertising, editorial contact and brochure preparation.

GERMAN DEMOCRATIC REPUBLIC: Counselling on arrangements for Economic and Technological Congress in May 1978 including list preparation, invitations, news release and mailing.

PRINCE EDWARD ISLAND: Counselling on development of News articles and editorials visitation for economic development purposes.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☐ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

~~RECEIVED FROM FOREIGN PRINCIPALS~~

NOT APPLICABLE

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

NOT APPLICABLE

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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(see attached listing of receipts - monies from foreign principals)

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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NOT APPLICABLE

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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(see attached listing of disbursements - monies for foreign principals)

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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NOT APPLICABLE

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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NOT APPLICABLE

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.
NETHERLANDS ANTILLES: 30 Rockefeller Plaza, N.Y., N.Y. 10020
NEWFOUNDLAND DEPT. OF INDUSTRIAL DEV.: St. John's, Newfoundland, Canada
TRINIDAD & TOBAGO INDUSTRIAL DEV. CORP.: Port of Spain, Trinidad, W. I.

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

NOT APPLICABLE

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☐ Letters or telegrams
articles
☐ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches
☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☒ Newspapers ☐ Libraries
☐ Legislators ☒ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (Specify) _____

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☐ No ☐

Exhibit B⁷ Yes ☐ No ☐ NOT APPLICABLE

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☐

NOT APPLICABLE

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6-month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐ NOT APPLICABLE

If no, please attach the required amendment.

NOT APPLICABLE

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

NOT APPLICABLE

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Ted M. Levine

Ted M. Levine, Pres.

Emanuel T. Ellenis

Emanuel T. Ellenis, Vice Pres.

Subscribed and sworn to before me at 733 Third Avenue, New York, N. Y. 10017

this 3rd day of March, 1978

Prudence L. Hutchinson

(Signature of Notary Public or other officer)

No. 31-100000

Qualified in New York County

Commission Expires March 30, 1979

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

German Democratic Republic

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Netherlands Antilles Economic Mission

1977	8/1/77 - 1/19/78	Total	Fee	Expense	Receipts		
1 Sept 1		1761 13	1500 -	261 13			
2 1 29		1580 95	1500 -	80 95			
3 Oct 31		1812 91	1500 -	312 91			
4 Dec 1		1547 35	1500 -	47 35			
5 27		1670 84	1500 -	170 84			
6 1978							
7 Jan 27		1677 61	1500 -	177 61			
8		1005079	9000 -	105079			
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1	Sept 26	1733332	1733332	
2	Nov 11	1134609	866666	467943
3	Dec 10	433333	433333	
4	1978			
5	Jan 26	433333	433333	
6		3734607	3466664	467943
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1	Aug 24		513 -		513 -	1
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3	Dec 5		3000 -	3000 -		3
4			3600 10	3000 -	600 10	4
5						5
6						6
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German Democratic Republic

1978	8/1/77 - 1/2/78	Purpose	Disbursements	
			Amt	Total
1 Jan 23	Columbia Book Publ.	Directory	25-	
2	Frank Knight	Expenses	3551	
3	Assoc. of Iron & Steel Enginrs	Directory	20-	
4	x Ted M. Levine	Expenses	1760	
5	Frank Knight	"	2755	
6				18566
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Netherlands Antilles Economic Mission

1977		8/1/77 - 1/19/78	Purpose	Disbursements		Amount	total
1	Aug 8	Burrell's Press Clip.	Press Clips			7675	
2	Sep 16	Irene Cohen	Expenses			485	
3	Oct 13	Burrell	Press Clips			15560	
4	Nov 10	"	"			75-	
5	Dec 13	"	"			7710	
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Newfoundland Dept. of Industrial Development

1977	8/1/77 - 1/29/78 Quantum	Purpose	Disbursements	
			Amt.	Total
1	Oct 17 Emanuel T. Ellenis	Expenses	67.50	
2	Capeland Culler	Travel	460.15	
3	Nov 14 Robt. Reilly & Sons	Customs Broker	377.5	
4	17 WOR-TV	Tape	80.-	
5	Dec 8 Irene Cohen	Expenses	5.5	
6	15 Media Distribution	Printing	17.55	
7	Western Union	Telegrams	109.61	
8	1978			
9	Jan 6 Media Distribution	Printing	179.5	
10	Robt. Reilly & Sons	Customs Broker	41.-	
11	York Directions	Photostats	47.38	
12	Cue Recording Studio	Tapes	87.50	
13	Irene Cohen	Expenses	39.65	
14	18 Emanuel T. Ellenis	" + Travel	532.61	
15	Archer Courier	messenger	12.90	
16	Ted M. Levine	Expense	6.00	
17	News World	Press Clips	1.-	
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St. Lucia National Development Corp.

1977		Purpose	Disbursements	
			Amt.	Total
1	Aug 15	Brod Printing	50474	
2		Frank Knight	46419	
3	Sept 1	Copeland Cutler	305-	
4	6	Hy Photo	8910	
5		Active Photo	5551	
6	Oct 14	"	988	
7	27	Cosmo Graphic	5-	
8	Nov 3	Saddle River	826-	
9	Dec 14	ALstat Photo	1917	
10		Active Photo	2219	
11		Berkey K & L	5357	
12	1978			
13	Jan 6	Journal of Commerce	1980.50	
14		Frank Knight	560	
15	13	Active Photo	1134	
16	27	Century Letter	920-	
17				5067.79
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Trinidad + Tobago Industrial Development Corp.

1977	8/1/77 - 1/19/78	Purpose	Disbursements	
			Amt.	TOTAL
1	Aug 8	Flambeau Quarterly	Space	80 -
2	8	Hy Photo	Photos	750
3	9	Media Distribution	Printing	4559
4		Fairchild Pubn.	Space	48743
5	15	Emery Air Freight	Freight	9857
6	Sept 1	Frank Knight	Expenses	4587
7		Saddle River Studios	Art work	28 -
8	6	Lexington Labs	Photos	6804
9		Positives Plus	Negatives	27204
10	16	Daily Record	Space	23704
11		Luckow	Conference Lunch	56736
12	19	FLambeau Qtrly.	Space	86 -
13	Oct 13	Fairchild Pubn.	"	97485
14		Fortune Mag.	"	411502
15	21	Business Week	"	683060
16	Nov 3	Axxion	Photos	430
17		Business Week	Space	3240
18		Canadian Bus. Mag.	"	121389
19		Saddle River	Art work	18 -
20	10	Bd. of Trade Journal	Space	53629
21		Media Distribution	Printing	31511
22		Industry Week	Space	343477
23		Business Week	"	683060
24	16	Financial Post	"	130274
25		The Gazette	"	53571
26		Industry Week	"	251060
27	Dec 8	Bd of Trade Journal	"	55710
28		Business Week	"	2499 -
29	9	Financial Post	"	135338
30		Industrial Development	Subscription	35 -
31		Industry Week	Space	833 -
32	14	American Banker	"	543
33		Berkey K.L.	Photos	3726
34		Positives Plus	Negatives	20584
35	1978			
36	Jan 5	Dun's Review	Space	713150
37		Globe & Mail	"	174147
38	19	Millie Brown	Expenses	2140
39	15	IPC Business Press	Subscription	1750
40				4614040

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes x or No

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes or No

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Ted M. Levine
Signature

February 28, 1978
Date

Ted M. Levine

Please type or print name of
signatory on the line above

President
Title